

To: Mullin, Michelle[Mullin.Michelle@epa.gov]
Cc: Piplic, Devlin[piplicd@monroe.wednet.edu]; Ramanauskas, Peter[ramanauskas.peter@epa.gov]; Moore, Kendall[moore.kendall@epa.gov]; Peachey, Robert[peachey.robert@epa.gov]; Skadowski, Suzanne[Skadowski.Suzanne@epa.gov]; Dalrymple, Anne[Dalrymple.Anne@epa.gov]; McArthur, Lisa[McArthur.Lisa@epa.gov]; Bernard, Nancy (DOH)[Nancy.Bernard@doh.wa.gov]; Amanda Zych[azych@snohd.org]; Jeff Ketchel[jketchel@snohd.org]
From: Mannix, John
Sent: Sat 5/21/2016 12:27:05 AM
Subject: Re: Follow up questions/comments from EPA

Hello Everyone,

I have spent some time today reviewing the email below from Ms. Mullin, and it appears that perhaps we are not all as aligned on what should be included in the final plan as I had believed following our call yesterday. While some of these requests are fairly simple to incorporate into the final draft plan, others present additional and elevated requirements to what has been previously discussed. I would greatly appreciate your assistance in ensuring that I am understanding these requests and the rationale behind them, as well as their implication on the timeline. I can make myself available for a call on Monday, May 23, or on Tuesday, May 24, between 9:00 a.m. – 2:00 p.m., Pacific Time. Please let me know if you can be available for a call during either of those times.

To make our conversation as productive as possible, I would like to take this opportunity to provide some clarification and pose some discussion points for the call. This is not an exhaustive list, as some issues are just being discussed on our end, but I wanted to provide as much information in advance as possible.

- In response to some apparent confusion regarding the fixtures, I want to clarify that all fluorescent light fixtures in the Annex Building and Library/Pod Building have been cleaned using Xylene. These are the only buildings in which any PCBs were detected in air samples and, for that reason, we prioritized them on the cleaning schedule. The fixtures in the remaining three buildings will be cleaned by the end of August.
- The term “spot checking” was used to mean a visual inspection of light fixtures. Expectations were not met when any residue was noticed that could possibly indicate PCB residue. Once any fixtures failed to meet expectations, all other fixtures in the area were visually inspected and all were re-cleaned to meet expectations.
- I would like assistance in understanding what fixture testing is now being requested and the reason for it. We previously discussed performing random wipe sampling at the conclusion of cleaning of other fluorescent light fixtures in which some residue was noted. It was understood that unsatisfactory results from the random wipe testing may cause further investigation and testing, but all fixtures would not be tested. It now appears that wipe testing of all fixtures is being requested. I want to clarify whether this is all fixtures irregardless of whether any residue was noted, or all fixtures wherein residue was found. I would also like clarification regarding the use of the term "Confirmation Testing" and the relationship between the testing requested in Items 5 and 6 in Ms. Mullin's email. that this is what is being requested and gain a better understanding on what the reason is for this change.

- It appears that quarterly air and wipe testing is now being requested in the first year, and annual air and wipe testing thereafter. Previously, we had discussed annual wipe testing. Again, I would like to clarify what is being requested and gain a better understanding on what the reason is for this change.
- It appears that soil sampling is now being requested. Previously, we had not had any discussion of soil testing.

My apologies for requesting this additional guidance, I must admit however that although I had thought that I had a good understanding of what was required to be in the final draft plan, that is no longer the case. I am also greatly concerned as to whether I will be able to provide the additional clarification that is sought by the close of business, Central Time, on Wednesday.

Respectfully,

John Mannix
Assistant Superintendent for Operations

200 E. Fremont Street
 Monroe, WA 98272
 (360) 804-2579

Monroe Public Schools provides an outstanding education that results in all students having a passion for learning.

On Thu, May 19, 2016 at 2:34 PM, Mullin, Michelle <Mullin.Michelle@epa.gov> wrote:

Dear Mr. Mannix-

Thank you for the call today. As stated, I had a few outstanding questions regarding your recent email, and additional items I would like to see included in your May 25, 2016 proposal.

1. I understand that all ballasts with the potential to contain PCBs have been removed. Please ensure that they are properly stored for disposal in accordance with [40 CFR 761.65](#) and include documentation as such in your proposal.
2. I am unclear which light ballast fixtures have been cleaned, which have failed your visual spot-checks, and which have been re-tested. In one document you state all of them have been cleaned, but then you provide bulleted lists identifying locations that EPA tested or where PCBs were identified in the air. These lists do not constitute the entirety of potential PCB ballast locations- either from your own visual spot checking, identification of residue, air testing, or carpet residues. The lists are specifically missing the Large Gym, Gathering Place West, Annex Room E-East, Annex Room E-West, Room 8, the Music Room, Administration Building Server Room, Gym Boys Locker Room and Room 10. These locations were identified to either have PCBs in the air at concentrations <100 ng/m³, or identified residue on the ballast fixtures, or in the case of Room 8, PCBs in the carpet. The Large Gym also had PCBs in a floor wipe sample at 3.4 ug/100cm².

a. Please ensure that the May 25 proposal clearly addresses each of these rooms in terms of the status of re-cleaning the light fixtures.

3. Please explain in your May 25 proposal what is meant by “spot checking”. Is this visual observation of the fixtures? What does it mean that a fixture did not meet expectations through spot-checking. Was there visible residue? Be sure to identify which fixtures failed spot-checking and were subject to re-cleaning.

4. In your “Email to EPA” document you state that the maintenance crew is continuing to clean all other FLBs and will be done by the end of August. On today’s call it sounded like all FLB activity will be completed much sooner. Please make sure it is clear in your May 25 proposal that

a. All potentially PCB containing FLBs are removed and properly stored for disposal,

b. All fixtures where potentially PCB containing FLBs, or identified PCB FLBs were previously housed are either cleaned and verified with follow up wipe testing; or provide the details for re-cleaning and testing needs including timeline. This includes those locations identified by EPA, as well as locations identified in your reports (see #2 above), and any other locations that you have identified throughout your work to date, potentially including those locations that failed spot-checking.

5. Confirmation testing:

a. Wipe testing on fixtures: Based on your recent email, it appears that you have collected wipe samples now for all of the fixtures where EPA identified PCB FLB leaks, and some additional rooms. However, it is not clear that you have collected confirmation wipe samples from all fixtures where evidence (either direct or indirect) of PCB leaks occurred. Please include in your May 25 proposal either evidence that all suspect PCB ballast fixtures have been wipe tested or a timeline for completing such. (See #2 above for the minimum locations for confirmatory wipe testing in fixtures, as well as potentially those locations that failed spot-checking). This is in addition to your planned random wipe sampling.

b. Based on your recent emails it appears that the HVAC systems are operating under different parameters than when the initial round of surface wipe and air samples were collected. Due to this fact, as well as the fact that the EPA ELES for indoor school air are not a “bright line” and only a level for further evaluation, we require additional air and surface wipe monitoring to ensure that PCB concentrations in indoor air and surfaces do not pose a risk to human health or the environment. These samples should be collected both in areas previously identified as over the thresholds for evaluation as well as areas under the thresholds.

i. Wipe testing on surfaces other than light fixtures: In every room where PCBs were identified either in the air, caulk, fixtures, carpet or other media, you should plan to collect additional confirmatory wipe samples from surfaces such as desks and windowsills. You should also include random sampling of surfaces from other rooms where PCBs were not identified previously.

ii. Air sampling: In every room where PCBs were identified either in the air, caulk, fixtures, carpet or other media, you should plan to collect additional confirmatory air samples. At a minimum this includes the rooms you identified in your recent email as well as the Large Gym, Annex Hall E, Annex Hall W, Annex Room E-East, Annex Room E-West, the Main Office West, the Music Room, Room 7, Room 8 and Room 20. You should also include random sampling of air from other rooms where PCBs were not identified previously.

c. To appropriately capture seasonal and classroom use variation as potential variables affecting PCB concentrations in indoor air and surface dust, please ensure that your May 25 proposal includes quarterly sampling for one year of surfaces and indoor air. The location of these samples should include areas abated for PCBs as well as areas not abated.

6. Your May 25 proposal should include a detailed plan to ensure that abatement activities of caulk does not result in the release of PCB contaminated caulk to the environment. Please see EPA guidance for caulk removal and include your plan for preventing the generation or mobilization of dust during work. Similar work in R10 has included erecting a “containment” around the removal activity through the use of poly-sheeting and negative air machines, and monitoring for dust excursions with a particulate monitor outside of the containment structure. Steps to Safe PCB Abatement: <https://www.epa.gov/pCBS/steps-safe-pcb-abatement-activities>, Summary of Tools and Methods for Caulk Removal: <https://www.epa.gov/pCBS/summary-tools-and-methods-caulk-removal>, Steps to Safe Renovation and Repair Activities: <https://www.epa.gov/pCBS/steps-safe-renovation-and-repair-activities>

7. Please also include a contingency to address any releases of caulk/caulk dust under the [PCB Spill Cleanup Policy](#).

8. Where you have identified PCBs in exterior caulk, such as in columns and windows, you will also need to test the

adjacent and underlying soil after removing the caulk to ensure that there is no PCB remediation waste left behind. Please include in your May 25 proposal a plan for ensuring soils around or underneath of PCB contaminated caulk do not present a risk to human health or the environment.

Please let me know if you have any questions.

Sincerely,

Michelle Mullin

PCB Coordinator

US EPA Region 10

1200 6th Avenue | Suite 900 | AWT-150

NOTE NEW MAILING ADDRESS

Seattle, WA 98101

mullin.michelle@epa.gov

206-553-1616

www.epa.gov/region10/pcb.html

Any dissemination or use of this information by a person other than the intended recipient is unauthorized and may be illegal. If you have received this e-mail in error, please immediately notify us by return e-mail. All email to and from this domain is archived as a public record in compliance with federal and state requirements. As such they may be both discoverable in a legal action and available through a public records request.